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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE ROGER T. BENITEZ)

UNITED STATES OF AMERICA,)	Case No. 08CR1447-BEN
)	
Plaintiff,)	Date: June 23, 2008
)	Time: 2:00 p.m.
v.)	
)	NOTICE OF MOTIONS AND MOTIONS TO:
SALVADOR GALLARDO-VALLECILLO,)	1) COMPEL DISCOVERY;
)	2) PRESERVE EVIDENCE;
Defendant)	3) GRANT LEAVE TO FILE FURTHER MOTIONS.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY
LUELLA CALDITO, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on June 23, 2008 at 2:00 p.m. or as soon thereafter as counsel may be heard, Salvador Gallardo-Vallecillo, by and through counsel, Robert R. Henssler Jr., and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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MOTIONS

Salvador Gallardo-Vallecillo, by and through counsel, Robert R. Henssler Jr., and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- (1) Compel discovery;
- (2) Preserve evidence;
- (3) Grant leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

/s/ Robert R. Henssler, Jr.

Dated: June 9, 2008

ROBERT R. HENSSLER JR.
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Gallardo-Vallecillo

CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of his information and belief, and that a copy of the foregoing document has been served this day upon:

LUELA CALDITO

U S Attorneys Office Southern District of California
880 Front Street
Room 6293
San Diego, CA 92101
(619)557-5610
Email: Luella.caldito@usdoj.gov

Dated: June 9, 2008

/s/ Robert R. Henssler
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